38118

2 9 0006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-ERRB

ACTION MEMORANDUM

Subject: Request for a Removal Action Ceiling Increase at the Center Star Manufacturing Site in City of Oxford, Calhoun County, Alabama

From: D. Karen Knight, CHMM, On-Scene Coordinator JFN for
Emergency Response and Removal Branch

To: Richard D. Green, Director
Waste Management Division

Site ID#: A4N7

I. PURPOSE

The purpose of this Action Memorandum is to request and document a ceiling increase to continue the removal action at the Center Star Manufacturing Site (the Site), located in City of Oxford , Calhoun County, Alabama. This Site poses a threat to the public health and environment that meets the NCP Section 300.145(b)(2) criteria for removal actions. An emergency removal action under the OSC's $200,000 warrant authority was initiated on April 23, 1999, by OSC Fred Stroud to stabilize leaking drums and secure the site. Further removal actions must be taken to abate the potential release of hazardous substances from the abandoned textile manufacturing facility into the environment. The total project ceiling, if approved, will be $445,960 of which an estimated $258,300 will be funded for the emergency cleanup contractor.

II. SITE CONDITIONS AND BACKGROUND

A. Removal Site Description

The CERCLIS ID number for this time critical removal action is ALSFN0406945.

1. Removal Site Evaluation

The Center Star Manufacturing Site is an abandoned textile manufacturing facility. The facility is located on 207 West Hamric Drive (Highway 78), in a mixed commercial/light industrial/residential area situated northwest of City of Oxford, located in Calhoun County, Alabama. The facility property comprises of 5.1 acres consisting of single concrete and metal siding building, two paved parking areas, and is surrounded by a locked, chain link fence. The building has six bays, which were primarily used for fabric processing (preparation, dyeing, and finishing) and storage. Based on review of the facility O&M manuals and raw material order forms, the fabric processing appeared to be in operation, as late as, December 1995 to January 1996.

On April 23, 1999, Alabama Department of Environmental Management (ADEM) requested that EPA conduct an emergency removal action to mitigate the threat from improperly stored and leaking containers located in the parking lots of the Site. OSC Fred Stroud directed a removal cleanup contractor to stabilize the Site by overpacking six drums (containing hazardous waste and/or oily constituents) and then stage these six "overpacked" drums along with a small container in the upper north parking lot. Also, to reduce vandalism, the fence was repaired and secured with locks. No site entry into the building was made during this emergency response action. (Attachment 1.0 contains the "$200,000 Emergency Action Memorandum" for this emergency response).

On July 20, 1999, a site evaluation of the Site (to include inspection of the building) was conducted by OSC D. Karen Knight with representatives from ADEM, EPA Emergency and Rapid Response Service (ERRS) contractor, and EPA Superfund Technical Assessment and Response Team (START) contractor. Approximately 130 containers, drums, industrial chemicals and waste materials were abandoned inside and stored improperly in the building. Several containers had unknown contents and some drums and other waste materials were leaking and spilled onto the concrete floor of the building. Incompatible materials were stored next to each other. Hazardous wastes, hazardous substances and materials, such as corrosive - caustics (sodium hydroxide), oxidizers (potassium permanganate), corrosive - acids (sulfuric, sulfamic, oxalic and acetic acids) , and toxics (perchloroethylene and sodium hydrosulfite) were present. A variety of dyes used in the textile dyeing process were also stored in the building. Quantities of water treatment chemicals (sodium bisulfite and sodium hydroxide) used for the boilers were present. Also, evidence of trespassing was found.

Under the direction of OSC D. Karen Knight, from July 26 to July 31, 1999, the ERRS contractor completed hazard chemical identification, categorization, and sampling of the abandoned containers, drums, industrial chemicals (containers) and waste materials. Based on results from the hazard

classification and compatibility, the ERRS contractor began segregation and staging containers and waste materials in appropriate groups. Samples were collected and sent to a laboratory for analysis to support future treatment and disposal activities. In addition, the START contractor provided air monitoring, conducted an expanded reconnaissance of the site and the surrounding community and located geoprobe monitoring wells installed during a property "due diligence" Phase I and Phase II Environmental Site Assessment conducted in 1998. This study was funded by the First Commercial Bank of Birmingham (FCB) and conducted by Bhate Environmental, Inc. of Birmingham.

The Industrial Development Board (IDB) of the City of Oxford owns the property on which Center Star Manufacturing, Inc. facility operated. The principals of Center Star Manufacturing , Inc. are Mr. Bobby Jones and Mr. William Wilson. (See attached Enforcement Addendum for additional information).

In November 1998, the City of Oxford's IDB forwarded a copy of the Bhate Environmental Site Assessment Report to ADEM. The Phase I Environmental Site Assessment was conducted in March 1998 and recommended further assessment activities to determine the potential for contamination from on-site and off-site sources. Using Geoprobe Sampling Systems, five (5) temporary wells were then installed in June, 1998, and an additional two (2) wells were installed on August, 1998. The results of this groundwater investigation (Phase II) identified elevated levels of tetrachloroethene, 1, 1, 1 trichloroethane and vinyl chloride present in the groundwater at levels above the ADEM's MCLs. Other detected constituents (toluene, ethylbenzene, xylenes, cis-1, 2, -dichloroethene, 1, 2, 3 - trichlorbenzene, 1, 2, 4 - trichlorobenzene, 1, 1 - dichloroethene, 1, 1, 2 - trichloroethane) were present at concentrations less than the respective MCLs. The assessment report concluded that "based on the VOC distribution and direction of the groundwater movement, the VOC plume appears to originate from the Center Star Manufacturing site." (See Attachment 2.0 of tables presenting VOC data from the groundwater investigation).

In March 1999, ADEM prepared a groundwater report on the Site. This report contained information on the groundwater routes (Valley and Ridge aquifer systems) and potential targets -- 3 active public water supply wells within four miles of the Site. (See Attachment 3.0 for a Base Map showing the public supply wells in vicinity of the Site). A draft Preliminary Assessment for the Site was prepared by ADEM in June 1999 and is undergoing internal review.

A ceiling increase in needed to address the removal, treatment, and disposal of the containers, non-hazardous materials and debris from the Site and complete other removal activities. The emergency action only stabilized the Site and provided funds for the hazard identification and temporary staging of the

containers. Additional funds are required to complete the final grouping of hazardous waste and non-hazardous materials; lab pack small hazardous waste containers; and, transport and dispose hazardous wastes, non-hazardous materials and debris off site. Also, funding will be needed to decontaminate the building floors, drainage trenches, sumps, drying vent hoods, and three boilers; and, decontaminate and remove the dye supporting structure, caustic tank and peroxide contaminated pipes. Funds are also needed to restrict site access and perform minor site tasks, such as clearing around the wells.

2. Physical Location

The site is located in a mixed commercial/light industrial area with residences, a child care center and a high school located in close proximity to the site. The site is on Hamric Drive (also known as U.S. Highway 78).. It is located on the right side of the road approximately 3/4 mile from the junction of U.S. Highway 78 and State Highway 21 going west.

The geographical coordinates for the site, collected with GPS, are 33 degrees 36' 22.5" North latitude and 85 degrees 50'47" West longitude.

The building at the Site where the textile manufacturing process was conducted is on concrete foundation at the 5.1 acre property. The property is almost completely paved and falls down gradient from the northern fenced boundary. The area immediately north of the fenced area has a number of residences. East of the site are residences 3/4 mile on U.S. Highway 78 with other residences located 1/2 mile west, south and southeast. The child care center, The Kids First Learning Center, is located 1/2 mile from the site and a High School is located approximately 1.0 mile from the site. The area immediately west of the site is equipment sales and service operation owned and operated by Tractor & Equipment Co., Inc. (TEC). The area immediately to the west has three facilities, Orkin Pest Control to the farthest southwest, Wilson Detail and Carwash in the center, and Coleman Construction Company to the northwest. Coleman Construction Company does asphalt work and has an underground storage tank on the site. The southern end of the property is bordered by U.S. Highway 78. Hager Hinge Company is located directly across this highway and also has been identified as a company that has documented VOC releases in the form of TCE and is presently has an on-going TCE remediation system. Alabama Coca-Cola Bottling company is located southwest of the Site on U.S. Highway 78.

3. Site Characteristics

Center Star Manufacturing, Inc. was a locally operated facility. Little is documented on the processes undertaken at the site other than the plant was part of the textile industry and primarily produced shirts. Based on ADEM's review of

information contained in the State's Industrial file, it appears that waste generated from the site was approved to be disposed of through the State Industrial Discharge (SID) permitted outfall, as no information on the facility could be located through RCRIS.

The site conditions inside the building during the site evaluation on July 20, 1999 were as follows:

- Along the eastside, there were three primary staging areas with abandoned containers, drums, industrial chemicals, residual waste drums/containers (unknowns) hazardous materials and debris. One staging area was located near the northeast wall of the building. (This area contained drums and containers requiring chemical identification.) The south end of the building appeared to be the former process area for fabric preparation, dyeing and finishing. At the process dye pit area on the southeast side, there existed large quantities of hazardous substances (evidence of spilled wastes), dye spills, debris and waste chemical residue. Also, a second staging area containing a variety of hazardous waste and materials in deteriorating condition were located nearby. The third staging area was located near one of the boilers in the far southeast corner of the building. In addition to containing various suspected waste boiler chemical drums, this third area had several former chemical mix containers with unknown solutions. Several containers had evidence of spillage and had crystalline substances on the outside of the containers and on the concrete floor.

- In the middle of the process area was a sodium hydroxide bulk storage concrete basin with poly tank containing residual solution. In the same location, were large amounts of solid waste debris from the removal of hydrogen peroxide bulk storage tank and there also existed influent and effluent pipe lines (most likely from the peroxide treatment system).

  Also, in this area, were two drying hoods attached to the roof of the building.

- Throughout the process area, there were solid waste piles and debris. These piles and debris were also present in the drainage trenches and in the secondary containment wall of the sodium hydroxide bulk storage concrete basin.

- The pit used for the dyeing was noticeable deteriorated and had signs of leakage into the concrete floor. A discharge point was directed to the outside of the building into an open natural drainage area which ran into the storm drainage system along Highway 78 (Hamric Drive). The discharge point also showed signs of erosion into the property used by the

Tractor and Equipment Company, Inc (TEC) located on the east side of the building.

- It is unknown what the condition of the underground drainage system is below the process area , but there was noticeable evidence of concrete deterioration and staining.

- Sports equipment and supplies were stored in the north portion of the building . The First Commercial Bank of Birmingham (FCB) notified the OSC that this equipment and supplies were stored in the building by Auctioneer of the FCB. Near this storage area, there were also two additional boilers located in the north end of the building and some chemical unknowns stored in the back storage room.

There are three (3) active public water supply wells and two (2) test wells located within 4 miles of the site. The closest active public water supply well is operated by Lee Brass company, and is located 3.28 miles to the northeast of the site. The other two wells are operated by the City of Oxford and are located 3.337 miles to the southwest of the site and 3.78 miles to the southeast of the site. A total of 7,000 customers receive their public water from the City of Oxford Water Treatment Plant. The two test wells are currently being developed for public water supply and will be in service in approximately one year. One of the test wells (Eagle Well) has TCE detected in samples collected from the well. The TCE concentration levels detected in the wells ranged from 2.0 PPB (12/11/97) to as high as 10.2 PPB (12/22/98). It was reported to the START contractor by Mr. Wayne Livingston, the General Manager of the City of Oxford Water Treatment Plant, that an air sparging treatment system will be installed on the wells to remove 97% of the TCE in drinking water.

The Site is not designated as wellhead protection area; however, well head protection areas are located within four miles of the site. The geology of the region is karst and the site has a relatively shallow aquifer (less than 25 feet), which makes it susceptible to contamination from the surface or near surface area sources.

Surface water drainage from the Site appears initially to be to the southeast into a subsurface ditch/unnamed tributary of the Choccolocco Creek. This unnamed tributary then flows approximately 200 feet to the east before turning to the southeast going under Highway 78 and then I-20

where it flows through a small residential area. Within 15 miles down stream to the site, the Choccolocco Creek is listed with a use classification for fish and wildlife.

Evidence of trespassing and vandalism were evident during the emergency response action on April 23, 1999, and during the site evaluation conducted on July 20,1999.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Numerous hazardous substances, as defined by Section 101(14) of CERCLA, are present in elevated concentrations in drums/containers/industrial chemicals/waste materials (containers). There are 130 containers located in the building at the Site. Many of these containers are leaking and releases could occur if they were disturbed. The floor drainage system and the dye pit are deteriorating and show evidence of spillage. Adverse weather conditions, or vandalism events, could disturb contents of hazard wastes and materials resulting in releases of hazardous substances. Releases could migrate off-site via the drainage system and/or the dye pit. Releases of hazardous substances at the Site is a concern because the Site is unattended, periodically frequented by trespassers, and in close proximity to industrial and residential areas. Some of the hazardous substances , wastes and/or materials in the containers include:

- DOT HAZARD OXIDIZER - Containers 20 and 111 contain Potassium Permanganate, RCRA Waste Code D001. Container/Drum 107 contains Potassium Chromate, RCRA Waste Code D001 and Silver Nitrate, RCRA Waste Code D001/D011.

- DOT HAZARD CORROSIVE - Containers 34,35,36,37, and 45 contain Sodium Hydroxide, RCRA Waste Code D002; Container 51 contains Sulfamic Acid, corrosive solid, non-regulated; Containers 73,74,75,76, and 107 contains Sulfuric Acid, corrosive (acid), RCRA Waste Code D002; Container 97 contains Acetic Acid, corrosive acid, RCRA Waste Code D002; Container 109 contains

Hydrofluoric Acid/Xylene Sulfonate, corrosive (acid), RCRA Waste Code D002; Container 107 contains Potassium Hydroxide, corrosive (caustic), RCRA Waste Code D001.

- DOT HAZARD TOXIC - Container 57 contains Methylene Chloride; Perchloroethylene, RCRAWaste Code, F001, F002, U080, and U210. Container 63 contains Chorotoluene and biphenyl, toxic (inhalation and

flammable), RCRA Waste Code D001; Container 60 contains Sodium Hydrosulfite, toxic and reactive, RCRA Waste Code D001.

- DOT HAZARD FLAMMABLE - Containers 15, 40, and 107 contain Isopropyl Alcohol, flammable, RCRA Waste Code D001; Container 104 contains Xylene, Toluene, various paints, RCRA Waste Code D001.

Please refer to Attachment 4.0 for a comprehensive list of the 130 containers inventoried at the Site. This inventory presents information on the possible hazardous constituents, container size, and hazard grouping.

A substantial fire and explosion hazard exists at this site due to the improperly stored volatile and semi-volatile hazardous substances in dilapidated containers and drums. Low flash points (less than 100°F) of some of these substances combined with other substances being incompatible with each other, further validates the fire and explosion hazard at the Site. Any fire and/or explosion at this Site, would directly threaten nearby businesses with fire and could release hazardous fumes, vapors, and gases, threatening businesses and residences downwind from the site.

There are VOCs in groundwater at the Site. As indicated earlier in this document, terachloroethene and trichloroethene levels exceeded the MCLs. On the basis of the Site Investigation Phase II conducted by Bhate Environmental, ADEM has surmized that hazardous waste was released at the Site and migrated into the groundwater.

5. NPL Status

The site is not on the National Priority List (NPL) at present. ADEM prepared a Preliminary Assessment in June 1999 and responded with EPA for the emergency response at the Site in April 1999. EPA will be conducting a removal assessment to determine extent of VOC contamination in the groundwater and subsurface soils at the Site. Results from this removal assessment will be provided to ADEM for use in determining whether the Site should be included on the NPL.

6. Maps, Pictures and Other Graphic Representations

All removal file information, which includes photos, sketches, etc., will be maintained by the OSC, and released to the EPA record center for inclusion in the site file.

B. Other Actions to Date

1. Previous Actions

The following is a chronological history of government and/or private actions that have been undertaken at the site:

-- September 1998. The Commercial Bank of Birmingham received "Report of Limited Groundwater Investigation" prepared by Bhate Environmental, Inc. This report presented results which indicated the presence of groundwater contamination by VOCs.

-- November 1998. The attorney for the City of Oxford Industrial Development Board (IDB) sent a copy of the Bhate Enviromental Inc.'s "Report of Limited Groundwater Investigation" to ADEM.

-- April 1999. An EPA emergency removal action was initiated on April 23, 1999. A $200,000 Emergency Action Memorandum/Initial Pollution Report was prepared and signed by OSC Fred Stroud on April 23, 1999.

-- June 1999. A Preliminary Assessment (PA) report was completed by ADEM pursuant to CERCLA.

-- July 1999. EPA conducted the first phase of the time critical removal.

2. Current Actions

EPA removal cleanup contractor completed hazard chemical identification, categorization and sampling of the abandoned containers in July 1999. Samples were collected and sent to a laboratory for analysis to support future treatment and disposal activities. Analytical results are pending.

Planning is on-going to develop a Site Investigation Plan to determine the extent of VOC contamination in the groundwater and subsurface soils at the Site. This sampling is required due to the proximity of the City of Oxford Water Treatment Plant, the karst geology, and the shallow aquifer. Results from this site investigation will provide supporting data for a possible source removal action in the future. This effort will be coordinated with the South Site Management Branch, Waste Management Division.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

In April 1999, ADEM, through the National Response Center, requested that EPA conduct an emergency removal action to mitigate the threat from improperly stored and leaking containers located in the parking lots of the Site. OSC Fred Stroud directed a removal cleanup contractor to stabilize the Site by overpacking six (6) drums (containing hazardous waste and/or oily constituents) and then stage these six (6) "overpacked" drums along with a small container in the upper north parking lot. Also, to reduce vandalism, the fence was repaired and secured with locks. Keys were distributed to ADEM for future use.

Two (2) representatives from the ADEM were present at the Site during the site evaluation and initial site removal activities in July 1998. These representatives located sample collection points from the geoprobe wells installed by Bhate Environmental, Inc., obtained site access, provided background information, coordinated meetings with the City of Oxford and the Commercial Bank of Birmingham, and assisted EPA with reconnaissance activities of the surrounding communities.

2. Potential for Continued State/Local Response

It is not anticipated that the ADEM or any local agencies will perform any additional response activities at the site. ADEM referred the Site to EPA because of funding limitations. EPA will continue to coordinate with the State and local agencies to keep them informed of removal site activities.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare, Section 300.415 (b)(2)(i, ii, iii, and vii) of the National Contingency Plan

EPA has determined that a threat of release as defined by Section 101 of CERCLA exists at the Site. The removal criteria outlined in the NCP will continue until all removal response actions are completed. The Site continues to meet the following NCP criterial as outlined in 300.415.

The Site meets the criteria of Section 300.415 (b) (2)(i) of having actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants. The building drainage system is deteriorating and is noticeably stained. These conditions could lead to releases of hazardous substances on-site and off-site. Deteriorating drainage, dye pit, and floor, or activities by vandals, could disturb the containers and tank (which holds hazardous waste) resulting in releases of hazardous substances.

The Site meets the criteria of Section 300.415 (b) (2)(ii) of actual or potential contamination of drinking water supplies or sensitive ecosystems. ADEM has documented groundwater contamination on-site with VOCs (tetrachloroethene, trichlorethene and vinyl chloride). Additional releases of hazardous substances from some of the containers on-site could further contaminate the groundwater. If the groundwater were to migrate (via Karst features) to the water supply wells, an ingestion and inhalation threat to the public would exist since all residents in the surrounding area depend on groundwater from the aquifer system for their daily needs. Although reconnaissance by the OSC and representative of ADEM did not discover any private wells in the immediate area, an investigation to determine any potable private wells needs to be conducted. Also, one public water well for the City of Oxford is located approximately 1/4 mile from the site and serves 7,000 customers. The use and effectiveness of air sparging to remove VOCs needs to be verified and documented.

The Site meets the criteria of Section 300.415 (b) (2)(iii) of having hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release. Releases and potential releases from the containers with hazardous wastes and materials present a direct contact exposure and inhalation threat to the public, since the Site is located in close proximity to surrounding businesses, is unattended, and attracts trespassers. Please refer to Sections II.3 and II.4 of this document for a detail description of the hazardous substances and other contaminants present in the containers.

The Site meets the criteria of Section 300.415 (b) (2)(vii) by having other situations or factors that may pose threats to public health or welfare or the environment. The containers with hazardous wastes or materials are stored improperly and are placed in a non-controlled environment (without HVAC) in the building. This situation is a substantial fire and explosion hazard. This poses a direct fire threat to several businesses that are located within a hundreds feet of the Site. Fire and/or explosions resulting from the containers would also produce toxic fumes and gases that would pose inhalation threats to workers at nearby

businesses and to residents located downwind of the Site. The site is unattended and attracts trespassers. Any activities by trespassers that involve fire increase the potential for a major fire or explosion at the site.

The chlorinated chemicals, oxidizing chemicals, corrosives (acid and caustic) and toxic wastes are hazardous substances which are known to have significant toxicological effects on the human body and can induce adverse health effects through the all or some of the exposure pathways (direct contact, inhalation, ingestion). Examples of some of the adverse health effects include: severe eye, skin, mucous membrane and respiratory irritation; anemia, headaches, dizziness, nausea, dermatitis and skin disease, narcosis, convulsions, coma, pulmonary edema, hemorrhage, kidney and liver disease, and central nervous system depression and damage. In addition, some of the hazardous substances present are known human carcinogens. For a detailed description of these health effects, please refer to the Health and Safety Plan prepared for the Site.

B. Threats to the Environment

The possible threat to human health posed by the direct contact threat at the Site from the abandoned containers and posed by the source contamination discharge into the groundwater is the primary rationale for conducting a removal action at the site. However, this Site does pose threats to the environment because any releases off-site into the surface water would directly threaten aquatic and animal life downstream of the Site.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions outlined in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Response Actions

1. *Proposed Action Description*

Immediate removal actions include the final segregation, staging, and consolidation of all hazardous substances located in the drums and containers. Decontaminate and/or remove all contaminated process equipment (tank, drying hoods, dye pit, piping, etc.), decontaminate stained/contaminated building floor, drainage trenches and boilers. Conduct transportation and disposal activities for hazardous

substances/wastes, non-hazardous materials and debris. Clear site grounds for site sampling investigation and conduct other minor removal tasks.

2. *Contribution to Remedial performance*

The proposed removal action is warranted to address the threats discussed in Section III of this memorandum, which meet the NCP Section 300.145(b)(2) removal criteria. This proposed removal action will aid in long term cleanup goals if further remedial actions are necessary.

3. *Description of Alternate Technologies*

Alternate technologies will be considered prior to the disposal/ treatment phase of this removal action. However, off-site disposal is likely to be most cost effective.

4. *Engineering Evaluation/Cost Analysis (EE/CA)*

This proposed action is time-critical and does not require an EE/CA.

5. *Applicable or Relevant and Appropriate Requirements (ARARs):*

The Federal ARARs for the proposed removal action at the Site are those portions of RCRA dealing with land disposal restrictions and storage of hazardous waste. In accordance with CERCLA Section 121(d)(3), all hazardous substances, pollutants, or contaminants transferred off-site for treatment, storage, or disposal during a CERCLA response action will be transferred in compliance with the land disposal restrictions of RCRA Section 3004 and 3005, and all other applicable Federal laws (e.g. Department of Transportation, 49 CFR Parts 100 to 185) and State of Alabama requirements. ERRB will comply, to the extent practicable, with the administrative and substantive requirements for these ARARs.

ADEM will be requested to identify recommended State ARARs. These requirements will be evaluated as they are identified during the removal and complied with, if practicable.

6. *Project Schedule:*

Response actions will be initiated upon approval of this Action Memorandum. Future activities resulting from the investigation of the

surface, subsurface soils and groundwater contamination may require a "change of scope" of the removal activity and an Action Memorandum requesting additional funds.

This project will be completed in two phases. Phase I involved securing the site, hazard identification and categorization, collecting and bulking samples for disposal analysis and other site setup activities. This phase was completed on July 31, 1999. Phase II will involve activities leading up to and the transportation and disposal of site wastes (hazardous and non-hazardous) decontamination activities, debris removal, and other minor tasks.

B. Estimated Costs

An Independent Government Cost Estimate (IGCE) was prepared for the additional ERRS removal activity.

Extramural Costs	**Current**	**Increase**	**Total**
Regional Allowance Costs: ERRS (15 % Contingency)	$ 80,000	$178,300	$258,300
Non-Regional Allowance Costs: START	$ 50,000		$ 50,000
Subtotal, Extramural Costs:	$ 130,000	$178,300	$398,300
Contingency (20%)	$ 45,000	$ 35,680	$ 80,660
TOTAL, EXTRAMURAL COSTS:	$ 175,000	$213,960	$388,960
Intramural Costs			
Intramural Direct:	$ 15,000	$15,000	$ 30,000
Intramural Indirect:	$ 10,000	$17,000	$ 27,000
TOTAL, INTRAMURAL COSTS:	$ 25,000	$32,000	$ 57,000
TOTAL, REMOVAL PROJECT CEILING:	$ 200,000	$245,960	$445,960

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action should be delayed or not taken, there will be a continued threat to the public health or welfare and the environment, as discussed in Section III of this Action Memorandum. These threats may worsen as containers continue to deteriorate and the threat of the release increases.

VII. OUTSTANDING POLICY ISSUES

No outstanding policies or issues have been identified at this time.

VII. ENFORCEMENT

Enforcement activities are ongoing. See Attachment, "Enforcement Sensitive", for more detailed information. ERRB is coordinating closely with the Office of Legal Support on enforcement and access issues.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Center Star Manufacturing Site, City of Oxford, Calhoun County, Alabama developed in accordance with CERCLA as amended, and not inconsistent with the NCP. Additional funds are necessary to complete the removal action at the Site. The decision is documented and based on the administrative record at the Site.

Conditions at the Site meet the NCP Section 300.145(b)(2) criteria for a removal action and I recommend your approval of the proposed action. The total project ceiling, if approved. will be $445,960, an increase of $ $245,960. Of this, an estimated $178,300 comes from the Regional Removal Advice of Allowance.

APPROVE: _____ Date 8/13/99

DISAPPROVE:_____ Date _____

Richard D. Green, Director
Waste Management Division
Environmental Protection Agency, Region IV

Site: Center Star Manufacturing

BREAK: 2.9

Note: Due to the CONFIDENTIAL nature of the material, page 0021 of this document has been withheld. Withheld material is available, for Judicial review only, in the Record Center at EPA Region IV, Atlanta, Georgia.